

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Case No.: 1:22-cv-1032 (PKC) (JRC)

Plaintiff,

NOTICE OF MOTION

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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PLEASE TAKE NOTICE that, upon the reading and filing of Plaintiff's Memorandum of Law in Support of its Motion for Reconsideration, Plaintiff, IME Watchdog, Inc., by and through the undersigned counsel, will move this Court before the Honorable Pamela K. Chen, U.S.D.J. ("Judge Chen") as soon as counsel may be heard, for an Order pursuant to Rule 59(e) of the Federal Rules of Civil Procedure (hereinafter referred to as "Rules" or "Rule") and Local Civil Rule 6.3, for reconsideration of this Court's Order dated September 25, 2024 to the extent of reversing the finding that Plaintiff has abandoned its claim for compensatory damages and reserving all claims for damages until trial, and for such other and further relief as this Court deems just, equitable, and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to ¶ III(B) of Judge Chen's Individual Practices and Rules, this motion may be made without a pre-motion conference.

PLEASE TAKE FURTHER NOTICE, pursuant to Rule 6 and Local Civil Rule 6.1, Plaintiff's opposition papers are due on October 23, 2024, unless otherwise ordered by this Court, and Plaintiff's reply papers in further support are due on October 30, 2024.

Dated: Lake Success, New York
October 9, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

By: /s/ Jamie S. Felsen
Attorneys for Plaintiff
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Dated: Lake Success, New York
October 9, 2024

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.
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